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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

09-CR-170-03-MO

v.

**GOVERNMENT'S SENTENCING
MEMORANDUM**

LISA M. MILES,

Sentencing Date

Defendant

May 5, 2011 at 11:30 a.m.

The United States of America, by Dwight C. Holton, United States Attorney for the District of Oregon, and Kemp L. Strickland, Assistant United States Attorney, respectfully submits the Government's Sentencing Memorandum for the Court's consideration. Except as noted in this memo, the government agrees with the factual findings and guideline application as set forth in the Pre-Sentence Report (PSR). The government has considered the letters from defendant, her family, and LifeWorks Northwest. Based on all the facts and circumstances surrounding this case, including defendant's cooperation, the government is recommending a sentence of time served

followed by 5 years of probation with the following recommendations for special conditions of probation:

- (1) Attend & Complete the “LifeWorks” program currently enrolled in for a period of 18 months; complete any and all group and therapy assignments, and; take any medication proscribed by a physician within the program (this condition may already be satisfied);
- (2) Enroll in an Complete (1) year Medical Office Coding course;
- (3) Obtain gainful employment;
- (4) Have no direct or indirect contact with co-defendant’s Donnico Johnson and James Jackson as well as unindicted co-conspirator Monique Aytch for the entire probationary period;
- (5) Agree to random urinalysis testing for alcohol and controlled substances as directed by probation officer.

In addition to these special conditions, the government requests the Court impose a special condition that defendant continue to cooperate with the government per cooperation agreement and as needed, in dismissed case CR 09-199.

In conclusion, based on the available information defendant Miles has indeed positively changed many aspects of her life. It is obvious that after 15 years of abuse at the hands of sex traffickers, she is and for the first time in her life, finally free from the coercive control of violent offenders. Her success and desire for change is rare indeed and seldom seen in these types of cases - where a person has been subjected to so many

years of degradation, physical and sexual abuse, as well as physical trauma. Her motivation to succeed in her new life is clear. Because she has worked so hard and become successful at making the many necessary changes for herself and family during the pretrial phase, the government does not see the benefit to continued home detention or home curfew. A sentence of credit for time served and 5 years of probation would provide a sentence that is sufficient, but not greater than necessary, pursuant to 18 U.S.C. § 3553(a). *See United States v. Tankersley*, 537 F.3d 1100, 1114-15 (9th Cir. 2008) (“The district court is charged with the responsibility of imposing a sentence that is “sufficient, but not greater than necessary”) (citations omitted).

DATED this 27th day of April 2011.

Respectfully submitted,

DWIGHT C. HOLTON
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District of Oregon

/s/ *Kemp L. Strickland*
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